

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001**

**Six-Day to Five-Day Street Delivery
And Related Service Changes, 2010**

Docket No. N2010-1

**INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS MICHAEL D. BRADLEY
(APWU/USPS-T6-1-2)
(April 23, 2010)**

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Michael D. Bradley (USPS-T-6). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness Joseph Corbett (APWU/USPS-T2-1-6), filed on April 23, 2010, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T6-1 On page 2 of your testimony, you discuss previous examination of potential cost savings of five-day delivery conducted by the Postal Service and the Postal Regulatory Commission. Please confirm that the Postal Service study conducted by IBM did not examine the possibility of eliminating any day of delivery other than Saturday. Also, please confirm that the PRC study conducted by GMU did not examine eliminating any particular day of service.

APWU/USPS-T6-2 On page 16 of your testimony lines 1-9 you state that “there are also some activities that could be considered to be volume related in a long-run sense. However, operations experts believe that almost all of this time will also be saved by the elimination from Saturday delivery.” Please identify the types of activities that you are referencing. Please provide the basis, including any studies and related documents, for the belief that the time spent on these activities will be saved.